

# Exhibit 7

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

**IN RE: INSULIN PRICING LITIGATION**

**THIS DOCUMENT RELATES TO:**

*State of Arizona v. Eli Lilly and Company, et al.*,  
Case No. 2:24-cv-260

**Case No. 2:23-md-03080  
MDL No. 3080**

**JUDGE BRIAN R. MARTINOTTI  
JUDGE RUKHSANAH L. SINGH**

**STATE OF ARIZONA AMENDED DAO SUBMISSION PURSUANT TO CMO #15**

**Departments, Agencies or Offices Information**

The State of Arizona hereby identifies the Departments, Agencies or Offices that possess information or documents responsive to the Plaintiff Fact Sheet (“PFS”) and whether such will be provided in the PFS response without the need for a Court order or subpoena.

Departments	Defendant Subpoena Needed
Attorney General's Office (“AGO”)	No
Arizona Department of Health Services (“ADHS”)	Yes
Arizona Department of Administration (“ADOA”)	Yes
Arizona Health Care Cost Containment System (“AHCCCS”) <sup>1</sup>	Yes
Arizona Department of Corrections, Rehabilitation, and Reentry (“ADCRR”)	Yes

For those Departments, Agencies or Offices that possess responsive information or documents and for whom a subpoena is needed, the State of Arizona responds to the following questions:

**(a) Basis for not providing such discovery**

<sup>1</sup> The State of Arizona has not asserted claims on behalf of AHCCCS, does not represent AHCCCS, and maintains that Medicaid is irrelevant to the instant proceedings. The State of Arizona includes AHCCCS in this document given that certain questions in the PFS may require information in the possession, custody, and control of AHCCCS.

ADHS, ADOA, ADCRR and AHCCCS are independent agencies that are not represented by the AGO's Consumer Protection and Advocacy Section with respect to this matter, and are not under the AGO's control, nor are they parties to this litigation.

**(b) Whether plaintiffs or its attorneys will be representing that entity if Defendants were to issue a R. 45 subpoena**

AGO may represent ADHS, ADOA, ADCRR, and AHCCCS if the Defendants choose to issue subpoenas to those entities and AGO is not disqualified from representation. AGO does not represent AHCCCS in any capacity. AGO and its counsel will cooperate and work collaboratively with counsel for any Arizona agencies who receive a Rule 45 subpoena from the Defendants in this matter.

**(c) Whether Plaintiff will claim privilege between Plaintiff or its attorneys or that entity**

To the extent that the AGO has exchanged any privileged communications or information with ADHS, ADOA, ADCRR, and AHCCCS the AGO will claim all appropriate privileges, including work product, common interest, and deliberative process privileges, with any Arizona agency to whom the Defendants issue a Rule 45 subpoena. AGO does not have an attorney-client relationship with AHCCCS. Because none of the listed agencies are relevant to the claims brought by the State of Arizona in this matter, at this stage, AGO is unaware of any privileged communications in this matter and therefore does not expect to claim an attorney-client privilege with respect to ADHS, ADOA, ADCRR, and AHCCCS but the AGO reserves the right to assert the attorney-client privilege should it discover that privileged information exists.

**(d) Whether Plaintiff or its attorneys issued a legal hold notice to that entity.**

Prior to the initiation of the lawsuit, outside counsel provided a litigation hold letter to AGO. Additionally, the AGO notified the listed agencies about the existence of the lawsuit, and more recently, the provisions of Case Management Order No. 15, including the categories of information and documentation that may be responsive to the Plaintiff Fact Sheet.

Dated: February 21, 2025

Respectfully submitted,

By: /s/ Shane Ham

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